

**THE WEITZ LAW FIRM, P.A.**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: MAR 30 2020

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Aventura, Florida 33160

March 17, 2020

**VIA CM/ECF**

Honorable Judge George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

**SO ORDERED:**

*George B. Daniels*  
George B. Daniels, U.S.D.J.

Re: Parenteau v. Russell Cellular, Inc., et al  
Case 1:19-cv-08661-GBD

Dated: MAR 30 2020

Dear Judge Daniels:

The undersigned represents the Plaintiff in the above-captioned case matter.

Due to the ongoing health crisis caused by the COVID-19 pandemic, and the tumultuous economic effects it is causing to virtually all businesses open to the public (including possible complete closures), such as the business involved in this matter, Plaintiff's undersigned counsel hereby respectfully requests that the Court grant a thirty (30) day stay of all deadlines and/or Conference in this matter.

Further, since undersigned counsel is based in Florida, an in-person Conference would require possible unsafe roundtrip travel from Florida to New York (in both of which official states of emergency has been declared). In fact, recently a passenger on a similar JetBlue flight from New York to Florida had tested positive for COVID-19. In addition, undersigned counsel suffers from an underlying asthmatic-type health condition which, potentially, would be adversely affected by the COVID-19 virus. However, in the event that the Court decides not to stay this matter, then, in the alternative, undersigned counsel respectfully requests that any future Conference be conducted telephonically, which is in accordance with SDNY's Chief Judge Coleen McMahon's recent March 13, 2020 Standing Order that "Judges are strongly encouraged to conduct court proceedings by telephone or video conferencing where practicable."

The Court may wish to note that this is undersigned counsel's first request to stay this matter. Thank you for your consideration of this unexpected, but essential, request.

Sincerely,

By: /s/ B. Bradley Weitz  
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